



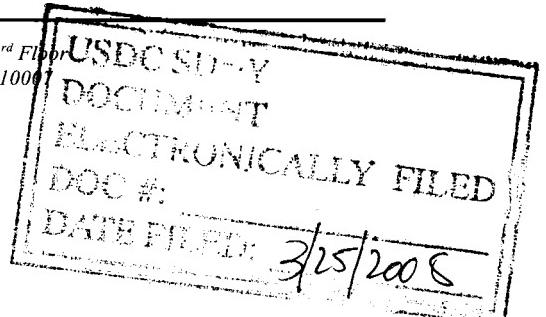
U.S. Department of Justice

*United States Attorney
Southern District of New York*

MAR 07 2008

86 Chambers Street, 3rd Floor
New York, New York 10007

March 6, 2008



By Hand

Hon. William H. Pauley
United States District Judge
United States Courthouse
500 Pearl Street, Room 2210
New York, New York 10007

Re: Natural Resources Defense Council, Inc. v. U.S. Dep't of State,
No. 07 Civ. 5929 (WHP)

Dear Judge Pauley:

I represent the United States Department of State (the "Government") in the above-referenced Freedom of Information Act ("FOIA") matter and write respectfully to request an extension of time from March 7, 2008, to March 14, 2008, for the Government to serve and file its motion for summary judgment and opposition to plaintiff NRDC's motion for summary judgment. This is the Government's first request for an extension of time. Plaintiff's counsel, Thom Cmar, consents to this request.

I make this request because I have been unable to complete the briefing in this matter because of the press of other business. Specifically, I was required to be out of the Office during the week of February 25, 2008, to conduct a site visit and interviews of approximately 15 witnesses in an ongoing civil rights investigation. In addition, upon my return this week, there were unexpected developments in another investigation that required immediate attention. Although substantial progress has been made on the Government's briefing in this case, I will be unable to complete the papers by tomorrow, March 7, 2008.

application granted. Plaintiff shall serve and file any reply and/or opposition by April 4, 2008 and Defendant shall serve and file SO ORDERED: and reply by April 15, 2008. hearing on May 4, 2008 at 3:00 p.m.

WILLIAM H. PAULEY III U.S.D.J.

3/13/2008

Hon. William H. Pauley

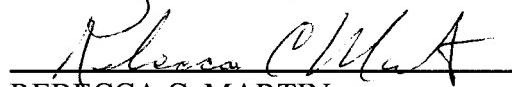
March 6, 2008

Thank you for your consideration of this request.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:


REBECCA C. MARTIN
Assistant United States Attorney
Telephone: (212) 637-2714
Facsimile: (212) 637-2686

cc: Thomas Cmar, Esq.
Natural Resources Defense Council
1200 New York Ave., N.W.
Suite 400
Washington, DC 20005
(By E-mail and First Class mail)